

KINGSLEY & KINGSLEY, APC
ERIC B. KINGSLEY, Esq., (SBN 185123)
eric@kingsleykingsley.com
KELSEY M. SZAMET, Esq., (SBN 260264)
kelsey@kingsleykingsley.com
JESSICA ADLOUNI, Esq. (SBN 328571)
jessica@kingsleykingsley.com
16133 Ventura Blvd., Suite 1200
Encino, CA 91436
Telephone: (818) 990-8300
Fax: (818) 990-2903

LEONARD CARDER, LLP
AARON KAUFMANN, (SBN 148580)
akaufmann@leonardcarder.com
DAVID POGREL, (SBN 203787)
dpogrel@leonardcarder.com
1999 Harrison Street, Suite 2700
Oakland, CA 94612
Telephone: (510) 272-0169
Fax: (510) 272-0174

Attorneys for Plaintiffs JOEY STEPHENS, MANUEL
MARTINEZ, ERIC MCINTYRE, JEREMY CAPPS, and
TYLER IRISH, on behalf of themselves and all others
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

JOEY STEPHENS, MANUEL MARTINEZ,
ERIC MCINTYRE, JEREMY CAPPS, AND
TYLER IRISH, an individual, on behalf of
themselves and others similarly situated,

PLAINTIFFS,

v.

HALL AMBULANCE SERVICE, INC.; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. BCV-20-101643

[Case Assigned for All Purposes to Hon Thomas
S. Clark in Dept. 17]

**DECLARATION OF TYLER IRISH IN
SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: August 1, 2023

Time: 8:30 A.M.

Dept.: 17

Complaint Filed: July 16, 2020

FAC Filed: August 7, 2020

1 I, TYLER IRISH, state and declare as follows:

2 1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-
3 captioned matter. The following is based upon my personal knowledge, and if called as a witness, I
4 could and would testify competently thereto.

5 2. I am a former employee of Defendant HALL AMBULANCE SERVICE, INC. ("Hall
6 Ambulance" or "Defendant") as an hourly employee.

7 3. I brought this lawsuit, on behalf of myself and all other Class Members, against
8 Defendant because I believe that Hall Ambulance failed to pay wages and/or overtime, provide meal
9 breaks, authorize and permit rest periods, pay minimum wage, and pay wages at the time of termination
10 to me and other employees.

11 4. I understand that I am representing other employees and I believe that I am able to
12 represent them well.

13 5. I spoke with attorney Aaron Kaufmann in approximately July 2020. He interviewed at
14 length regarding the pay, meal, and rest period practices at Hall Ambulance. Once I retained him, I
15 compiled relevant documents from my employment to assist my attorneys in investigating and
16 litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit.
17 The lawsuit was filed in July 16, 2020.

18 6. Throughout the litigation, I have provided my attorneys with helpful information for
19 this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes
20 providing information to my attorneys regarding my employment with Defendant, staying in regular
21 contact with my attorneys to discuss the status of the case, responding promptly to my attorneys'
22 various communications regarding this matter, attending a full-day mediation in March 17, 2021; and
23 reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was
24 fair and reasonable and in the best interests of the Class Members.

25 7. I estimate the total time spent in connection with this matter is approximately 25-35
26 hours.

27 8. I have worked to actively represent the other Class Members and their interests.

28 //

1 9. I have always kept the Class Members' interests at heart in this litigation.

2 10. I am prepared to continue assisting with this litigation and am committed to achieving
3 the best possible results for the Class.

4 11. I believe that the class action settlement obtained on behalf of the Class is fair and
5 reasonable considering the issues involved in this case. As mentioned above, I reviewed and discussed
6 the Settlement Agreement with my attorneys and asked them questions about it to ensure that I
7 understood its terms and what it would mean for all of the class members.

8 12. I believe that I have fairly represented the absent Class and request that the Court finally
9 approve this settlement and confirm me as Class Representative.

10 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
11 Class Representative in this action. I am not related in any way to my attorneys or to any other member
12 of the firm that is representing me. I have no business dealings or other involvement beyond this
13 lawsuit and this representation. I have not been promised any money or inducement to serve as Class
14 Representative in this action.

15 14. It is my opinion that the settlement agreement provides for a fair and adequate
16 enhancement for me as a Class Representative, in the amount of \$10,000. I believe that this is fair and
17 reasonable considering all of the work that I have performed in my role as Class Representative. As
18 Class Representative, I have actively participated in all stages of the litigation, as detailed above, and
19 have always maintained the best interests of the Class while performing my Class Representative
20 duties.

21 15. It is also my opinion that the Class Representative enhancement is fair, reasonable, and
22 adequate because, in addition to the many hours spent participating in the prosecution of this case, I
23 accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were
24 unsuccessful in this action. Likewise, I risk the potential stigma of being a Class Representative in a
25 class action labor dispute, which may affect my future employability.

26 ///

27 ///

28 ///

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct.

3 Executed on 7/10/2023 at Tehachapi, California.

4 DocuSigned by:
5 

6 4E8AEB9285D4406...
7 TYLER IRISH
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On July 10, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF TYLER IRISH IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

**JEFFER MANGELS BUTLER
& MITCHELL LLP**
R. SCOTT BRINK
rsb@jmbm.com
PATRICIA DESANTIS BELTON
pbelton@jmbm.com
1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308

LEONARD CARDER, LLP
AARON KAUFMANN
akaufmann@leonardcarder.com
DAVID POGREL
dpogrel@leonardcarder.com
1999 Harrison Street, Suite 2700
Oakland, CA 94612

☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

☒ **BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 10, 2023, at Sherman Oaks, California.



Leslie Sanchez